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SOUTH ASIAN AMERICANS LEADING TOGETHER

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October 31, 2016

Ms. Katherine K. Wallman

Chief Statistician

Office of Management and Budget

1800 G St., 9th Floor

Washington, D.C. 20503

Email: race-ethnicity@omb.eop.gov

Re: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity

Dear Ms. Wallman,

South Asian Americans Leading Together (SAALT) submits this comment in response to the Office of Management and Budget's (OMB) federal register notice regarding the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity ("Standards"), 81 FR 67398 (September 30, 2016).

The latest ACS data shows that the South Asian American population grew by more than one million in just three years, making it the fastest growing demographic group in the nation. Given the ethnic and religious diversity within the South Asian American community, having disaggregated data on discrete subgroups is critical to understanding the tremendous and unmet needs of our communities. SAALT supports the maximum number of checkboxes included, with the number used during the 2010 Census serving as a minimum. We also support the maximum number examples, with the number used during the 2010 Census serving as a minimum. SAALT has worked closely with the Census Bureau to outline the various subgroups to be included under the broader South Asian category.

SAALT also supports the addition of a Middle East and North Africa (MENA) region category in the recording of federal data on ethnicity. This category would be especially helpful in the U.S. Census, which currently does not count Americans of Middle Eastern and North African descent. Currently, Americans of Middle Eastern and North African descent are not counted in federal data, and must choose to define themselves as Black or African American, White, Asian, Native Hawaiian or other Pacific Islander, or American Indian or Alaska Native. With a MENA category, our communities will be able to identify along new ethnic terms and, in addition,

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specify which subgroup or nationality they belong to. We believe this step is essential in improving the data collected on and the standing of all communities.

We believe additional benefits of having a MENA category include:

• Enforcing the Voting Rights Act and drawing congressional and state legislative district boundaries
• Establishing federal affirmative action plans and evaluating claims of employment discrimination
• Monitoring discrimination in housing, mortgage lending and credit
• Helping minority owned small businesses get federal grants and loans
• Allow the government and independent scholars to understand trends of health, employment and education
• Better tracking of hate crimes and other civil rights violations

The current national climate of public discourse and policies has cast members of South Asian, Middle Eastern, and North African communities as suspicious and disloyal. This has resulted in escalated hate violence and increased profiling of our communities by law enforcement. It is more critical than ever that this data is captured to understand the impact and magnitude of these problems and accurately construct public policy solutions. Having disaggregated data on our communities continues to be an urgent priority. Utilizing the maximum number of checkboxes and establishing a MENA category begin to address this challenge. SAALT has outlined our need for disaggregated data to the Census Bureau as well as to the Department of Justice and Department of Homeland Security as they prepare for the census and revised policies on the use of race, respectively. Elected officials and government agencies can better serve our communities by establishing categories for data collection on subgroups and developing measures to enforce that collection.

Respectfully,

Lakshmi Sridaran
Director of National Policy and Advocacy

South Asian Americans Leading Together (SAALT)